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June 2, 2015

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Honorable Ann Marie Donio
Mitchell H. Cohen Bldg. & US Courthouse
4th & Cooper Streets
Camden, NJ 08101

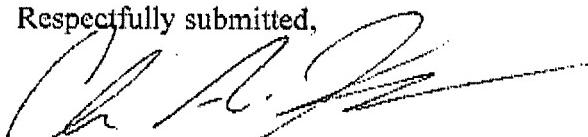
Re: **City of Atlantic City v. Zeemurray Street Capital, et al.**
Civil No. 14-5169 (RBK/AMD)

Dear Judge Donio:

On May 29, 2015, your Honor entered an Order requiring Defendant, Wes Drummon, to provide a certification that the BATES-Stamped documents 1 thru 96 encompassed all of the discovery documents for this matter in his custody, control, or possession. Defendant submitted his certification on June 1, 2015. Paragraph 2 of his certification, however, does not categorically state that the above-mentioned documents 1 thru 96 constitute all of the documents in his custody, control, or possession. Paragraph 2 of his certification contains a caveat that any other relevant documents found will be promptly provided to Plaintiff.

Plaintiff opposes Defendant Drummon's certification on this basis. We respectfully request that Your Honor require Defendant to produce another certification that categorically states without any caveats that no additional documents relevant to this case are in his custody, control, or possession.

Respectfully submitted,



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